

**MEMO ENDORSED**

**KEENAN & BHATIA, LLC**

90 Broad Street, Suite 200

New York, NY 10004

Tel: (917) 975-5278

www.keenanfirm.com

The application is   X   granted  
           denied

March 18, 2022

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

  
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Edgardo Ramos, U.S.D.J.

Dated: March 21, 2022

New York, New York 10007

RE: *Kaitlyn Ramirez v. Temin & Company, Inc.*, Case No. 1:20-cv-06258-ER  
Consent Application for Extension of Time to File Stipulation of Dismissal

Dear Judge Ramos:

This firm represents Plaintiff Kaitlyn Ramirez in this employment case. The parties have completed all settlement formalities, and are waiting for a revocation period to run before a dismissal can be filed. Plaintiff respectfully applies, with Defendants' agreement, for a 10-day extension of time in which to file the dismissal, up to and including March 28, 2022.

We thank the Court for its time and consideration.

Respectfully submitted,

KEENAN & BHATIA, LLC  
/s/ E.E. Keenan  
Attorney for Plaintiff

Cc: Michael Nacchio, Esq.